

1 ESTELA O. PINO, SBN 112975
2 **PINO & ASSOCIATES**
3 20 Bicentennial Circle, Suite 200
4 Sacramento, CA 95826
5 Telephone: (916) 641-2288
6 Facsimile: (916) 641-1888

7 Attorneys for the Plaintiffs' Executive Committee appointed by the Superior Court of the State
8 of California, in and for the County of Alameda, in Case No. RG16843631 and related cases.

9
10 THE UNITED STATES BANKRUPTCY COURT
11 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 In re:

15 PG&E CORPORATION,

16 Debtor.

Case Nos. 19-30088 (DM)
19-30089 (DM)

Chapter 11

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE**

17
18
19
20
21 In re:

PACIFIC GAS AND ELECTRIC COMPANY

Debtor.

22 **TO: THE DEBTORS IN POSSESSION; THE UNITED STATES TRUSTEE;**
23 **OTHER PARTIES IN INTEREST; AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

24 **PLEASE TAKE NOTICE** that the undersigned hereby enters an appearance in the
25 above captioned cases on behalf of the Plaintiffs' Executive Committee (hereinafter
26 referred to as the "Ghost Ship Warehouse Plaintiffs' Executive Committee"), appointed by
27 the Superior Court of the State of California, in and for the County of Alameda, Case No.
28 RG16843631 and related cases, pursuant to the terms of Case Management Order

1 Number 2 Re Organization of Plaintiffs' Counsel and Case Management Order Number 8
2 Regarding Further Organization of Plaintiffs' Counsel Executive Committee.

3 **PLEASE TAKE FURTHER NOTICE** that the Ghost Ship Warehouse Plaintiffs'
4 Executive Committee does hereby request notice of all applications, including but not
5 limited to, applications to employ attorneys, accountants, real estate brokers (and/or any
6 other professionals), motions, adversary proceedings, status reports, plans, disclosure
7 statements, and all other pleadings filed in relation to the above captioned cases, whether
8 sent by: the Court; the Debtors in Possession; the United States Trustee; or any other
9 party in interest in these cases.

10 **PLEASE TAKE FURTHER NOTICE** that all notices should be addressed to:

11 Mary E. Alexander, Plaintiffs' Liaison Counsel
12 MARY ALEXANDER & ASSOCIATES, P.C.
13 44 Montgomery Street, Suite 1303
14 San Francisco, CA 94104
Telephone: (415) 433-4440
Facsimile: (415) 433-5440
Email: malexander@maryalexanderlaw.com; and

15 Estela O. Pino
16 PINO & ASSOCIATES
17 20 Bicentennial Circle, Suite 200
18 Sacramento, CA 95826
Telephone: (916) 641-2288
Facsimile: (916) 641-1888
Email: epino@epinolaw.com

19 Neither this Notice of Appearance nor any subsequent appearance, pleading, claim,
20 or suit is intended to waive any right of the Ghost Ship Warehouse Plaintiffs' Executive
21 Committee and/or its constituent Plaintiffs to: (i) have final orders in applicable core
22 matters and/or non-core matters entered only after *de novo* review by a District Court
23 judge; (ii) trial by jury in any proceeding so triable herein, or in any case, controversy, or
24 proceeding related hereto; (iii) have the reference withdrawn by the District Court in any
25 matter subject to mandatory or discretionary withdrawal; (iv) have any final order entered
26 by, or other exercise of the judicial power of the United States performed by an Article III
27 court; (v) any objection to the jurisdiction of any Bankruptcy Judge for any purpose; (vi) any
28 election of remedy; (vii) any other rights, claims, actions, defenses, setoffs, at law or in

1 equity, all of which rights, claims, actions, defenses, setoffs, or recoupments creditor
2 expressly reserves; and/or (viii) the right to be served directly with pleadings commencing
3 an adversary proceeding; contested matter; and/or civil action.

4 Nothing contained herein, nor the representation of the Ghost Ship Warehouse
5 Plaintiffs' Executive Committee by the undersigned in these bankruptcy proceedings, shall
6 be construed as an express or implied designation of the undersigned as the agent to
7 receive service of process for the Ghost Ship Warehouse Plaintiffs' Executive Committee
8 and/or its constituent Plaintiffs, in any adversary proceeding, and/or contested matter, and
9 in fact, no such designation has been made.

10
11 Dated: January 30, 2019

Respectfully submitted,

12 **PINO & ASSOCIATES**

13
14
15 By: 

16 Estela O. Pino, Attorneys for the
17 Ghost Ship Warehouse Plaintiffs' Executive
18 Committee
19
20
21
22
23
24
25
26
27
28